

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

BEEQB, LLC, a Florida Corporation,

Plaintiff,

v.

BLOCKQUARRY CORP., f/k/a ISW
HOLDINGS, INC., a Nevada Corporation, and
PANTHEON RESOURCES, INC.,

Defendant.

C/A No.: 7:24-cv-03179-TMC

**CONSENT MOTION FOR
EXTENSION OF TIME**

Defendant BlockQuarry Corp., f/k/a ISW Holdings, Inc. (“BlockQuarry”), by and through its undersigned counsel, hereby files this Consent Motion for Extension of Time (“Motion”) and respectfully requests that this Court issue an Order extending BlockQuarry’s deadline to file its Response to Plaintiff BEEQB, LLC’s (“Plaintiff”) Motion to Dismiss Amended Counterclaims of Defendant BlockQuarry, Corp. (“Motion to Dismiss”) (ECF No. 27) by 10 days, to October 7, 2024. In support of this Motion, BlockQuarry states as follows:

1. On September 13, 2024, Plaintiff filed its Motion to Dismiss. (ECF No. 27).
2. BlockQuarry’s deadline to file its Response to the Motion to Dismiss is currently September 27, 2024. *Id.*
3. Two of BlockQuarry’s undersigned counsel have been, and will continue to be, out of the office for personal reasons through September 27, 2024. Therefore, BlockQuarry is respectfully requesting that the Court issue an Order that extends BlockQuarry’s deadline to file its Response by 10 days, to October 7, 2022. In return, BlockQuarry has agreed to give Plaintiff a concomitant 10-day extension of time to file its Reply in support of its Motion to Dismiss.

4. BlockQuarry's deadline to file its Response has not been previously extended, and the requested extension will not affect any other deadlines.

5. Prior to filing this Motion, and pursuant to Local Civ. Rule 7.02, undersigned counsel consulted with counsel for Plaintiff, and Plaintiff's counsel has indicated that Plaintiff consents to the relief requested herein.

Based on the foregoing, BlockQuarry respectfully requests that the Court grant this Motion and issue an Order extending BlockQuarry's deadline to file its Response to Plaintiff's Motion to Dismiss by 10 days, to October 7, 2024. BlockQuarry also respectfully requests that the Court issue an Order extending Plaintiff's deadline to file its Reply in support of its Motion to Dismiss by 10 days, to October 24, 2024.

Respectfully submitted,

MAYNARD NEXSEN PC

s/ Andrew A. Mathias

Andrew A. Mathias, Fed. ID No. 10166

Konstantine P. Diamaduros, Fed. ID No. 12368

Elizabeth C. Edmondson, Fed. ID No. 13208

104 S. Main Street, Suite 900 (29601)

Post Office Drawer 10648

Greenville, South Carolina 29603

Phone: 864.370.2211

Fax: 864.477.2617

AMathias@maynardnexsen.com

KDiamaduros@maynardnexsen.com

EEdmondson@maynardnexsen.com

September 19, 2024
Greenville, South Carolina

Attorneys for Defendant Blockquarry Corp. f/k/a ISW Holdings, Inc.